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6-1-04



**King County**  
**Wastewater Treatment Division**  
Industrial Waste Program  
Department of Natural Resources and Parks  
130 Nickerson Street, Suite 200  
Seattle, WA 98109-1658  
206-263-3000  
206-263-3001 Fax

*Mike*  
*See that you get tests*  
*results now to LFC see*  
*when we are at. Need*  
*official test for quarter end,*  
*may, June but want to make*  
*sure "K"*

June 1, 2004

Tom Craig  
Plant Manager  
Longview Fibre Company  
P.O. Box 24867  
Seattle, WA 98124

January 28, 2004 Discharge Violation for Copper

*Tom*

Dear Mr Craig:

I have received your corrective action report regarding the January 28, 2004 copper violation at the Longview Fibre Company facility.

Your investigation revealed that the press filters needing to be replaced caused the discharge violation. The corrective actions described in your letter include changing the treatment system's press filters and implementing a new schedule for replacing the filters.

Thank you for researching this discharge violation and implementing timely corrective actions. If you have any questions, please feel free to call me at 206-263-3012.

Sincerely,

Arnaud Girard  
Investigator  
Industrial Waste Program



CLEAN WATER - A SOUND INVESTMENT



LFC000883

May 24, 2004

Mr. Arnaud Girard  
Department of Natural Resources  
Wastewater Treatment Division  
130 Nickerson Street - Suite 200  
Seattle, WA 98109-1658

RE: Recent Sampling Results

Dear Mr. Girard:

We had some confusion on our part as to when and how to take the samples. Jim Mantell, who was in charge of this process, took a sudden retirement with 5 day's notice. The person now in charge of the sampling process thought he was taking the samples properly. We had, however, intended to take composite samples as you have suggested but this was not done.

We will take composite samples as your recent e-mail suggests. As to the result of 'over the authorization limit', we also misunderstood and thought the samples would all be averaged out, hence we would have been under 3.0. We found that after the results came back with a higher than normal result for copper (2/18/04 tests), our filters for the press of the treatment system needed to be changed out. In fact, within 2 weeks after this test, we did change out the filters. In checking with our supplier of this equipment and chemicals that are used, we should set up a schedule to change the filters out on a yearly basis. We have set up a work order (that will generate every 10 months as a reminder) to change out the filters on a regular basis.

We are confident that we will always be in compliance in our testing in the future and will make sure the filters are changed as indicated as well as further training with our operators to understand what to look for in this area as time goes by.

Sincerely,

Tom Craig  
Plant Manager  
LFCo -- Seattle

LFC000884

**Subject: [Fwd: Quarter 1 2004 SM report]**

**Date:** Wed, 19 May 2004 07:30:56 -0700

**From:** "Craig, Thomas D" <tdcraig@longfibre.com> **Internal**

**To:** "Anderson Michael j" <mjanderson@longfibre.com>

Lets discuss.

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**Subject: Quarter 1 2004 SM report**

**Date:** Thu, 13 May 2004 08:00:31 -0700

**From:** "Girard, Arnaud" <Arnaud.Girard@METROKC.GOV>

**To:** "'Tom Craig, Longview Fibre'" <tdcraig@longfibre.com>

Tom,

I received your Quarter 1 2004 self-monitoring report. For the 2/18/04 sample you collected 2 grab copper samples of the discharge. To save \$\$ in the future you can combine the grab samples collected during the duration of the discharge into one composite sample; this way you only have to send 1 sample to the lab for analysis.

Your Discharge Authorization requires that you collect composite samples. While each individual grab sample was in compliance with the copper grab discharge limit, the average of the 2 grab sample results is 3.05 mg/L, which is greater than 3.0 mg/L, the permitted discharge limit for a composite sample.

Please review your treatment system operational procedures, provide a reason for the discharge violation and describe any corrective actions taken to prevent recurrence.

Thank you

Arnaud Girard

Industrial Waste Program

Phone: (206) 263-3012

Fax: (206) 263-3001

<http://dnr.metrokc.gov/wlr/indwaste/index.htm>